IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS, VICTORIA DIVISION

Case No. 6:21-cv-0003-DBT	
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DECLARATION OF LAWRENCE J. JOSEPH

- I, Lawrence J. Joseph, hereby declare and state as follows:
- 1. I am over the age of 21 years and competent to make this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or a crime of dishonesty.
 - 2. I reside in McLean, Virginia.
- 3. In the above-captioned action, I am the counsel for movant and potential *amicus curiae* Immigration Reform Law Institute ("IRLI").
- 4. In my capacity as IRLI's counsel, on February 9, 2021, I visited the Department of Homeland Security ("DHS") website, dhs.gov, from which I visited the press-release page of that website, where I located the page captioned "Acting Secretary of DHS Directs a Review of Immigration Enforcement Practices and Policies" and dated January 20, 2021, which announces release of the of the memorandum (the "January 20 Memorandum") challenged in the above-captioned action. That page is available at https://www.dhs.gov/news/2021/01/20/acting-secretary-dhs-directs-review-immigration-enforcement-practices-and-policies# (last visited Feb. 9, 2021).
 - 5. From the page for the press release for the January 20 Memorandum, I downloaded

a PDF copy of the January 20 Memorandum from a link that my internet browser identified as https://www.dhs.gov/publication/memorandum-acting-secretary-pekoske-immigration-enforcement-policies (last visited Feb. 9, 2021).

- 6. Using Adobe Acrobat Pro DC (version 2020.013.20074), I opened the PDF copy of the January 20 Memorandum that I downloaded on February 8, 2021 and viewed the document's "Properties" under the "File" menu. Those Properties indicate the document's author as "Olavarria, Esther M. EOP/WHO". I saved a screenshot of the Properties to PDF, a true and correct copy of the screenshot (rotated 90 degrees to fit the page) is attached hereto as Exhibit A.
- 7. Using Adobe Acrobat Pro DC (version 2020.013.20074), I opened the PDF copy of the January 20 Memorandum that I downloaded on February 9, 2021 and viewed the document's "Properties" under the "File" menu. Those Properties are completely blank. I saved a screenshot of the Properties to PDF, a true and correct copy of the screenshot (rotated 90 degrees to fit the page) is attached hereto as Exhibit B.
- 8. I noticed DHS's removal of the January 20 Memorandum's "Properties" because I attempted to create a single screenshot exhibit to match the date of the filing of this declaration and the accompanying Memorandum. The February 8 and February 9 copies of the January 20 Memorandum and the two screenshot exhibits to this declaration have remained in my exclusive possession and control from the time I downloaded or created them to the time I finalized this declaration for filing in the above-captioned action.

I declare under penalty of perjury that the foregoing is true and correct. and that, if called as a witness, I would be competent to testify thereto. Executed on this 9th day of February 2021.

/s/ Lawrence J. Joseph

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EXHIBIT A

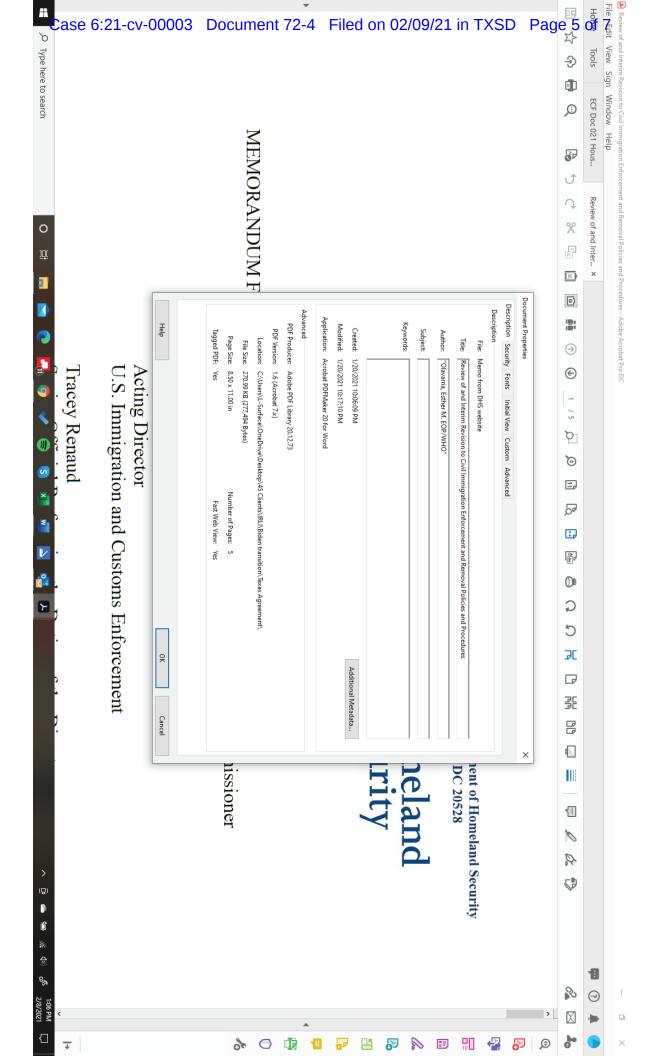


EXHIBIT B

